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DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 8/5/2024

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August 1, 2024

**VIA ECF**

Honorable Judge Analisa Torres  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**RE: CRC Insurance Services, Inc. v. James Suh**  
**Case No.: 22-cv-09528-AT-JEW**

Dear Judge Torres:

We represent Defendant James Suh (“Defendant”) in the above-referenced matter commenced by Plaintiff CRC Insurance Services, Inc (“CRC”). We are writing to inform the Court of our intent to file a pre-motion letter pursuant to Your Honor’s Individual Rule III. A. and C. and Local Rule 7.1 D seeking a pre-motion conference and leave to file a Motion for Summary Judgment in the above-referenced matter.

Per Your Honor’s rules—which provide that all pre-motion letters requesting a summary judgment conference are due 14 days of the discovery deadline, here July 19, 2024—the parties’ deadline for filing a pre-motion letter is currently Friday August 2, 2024.

However, considering that Your Honor recently assigned Plaintiff’s Motion to Extend the discovery deadline to Magistrate Willis and further considering that a conference on that motion has not yet been scheduled, Defendant respectfully requests that the deadline to file a pre-motion letter for summary judgment motions be extended to either 14 days from the date of the denial of Plaintiff’s Motion to Extend or, in the event Plaintiff’s Motion to Extend is granted, 14 days from the new discovery deadline.

Defendant believes that an extension of the deadline to file a pre-motion letter for summary judgment motions is in the best interest of both parties, as such an extension would allow the parties to focus their attention on the pending Motion to Extend before turning to summary judgment motions and related Rule 56.1 statements which are to be filed along with the pre motion letter.

MOUND COTTON WOLLAN & GREENGRASS LLP

*Honorable Judge Analisa Torres*  
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This is the first request for an extension of the deadline to file a pre motion letter in relation to a motion for summary judgment.

We appreciate Your Honor's consideration of the matters raised herein.

Respectfully submitted,


*Kenneth M. Labbate*

cc: All Counsel of Record  
(via ECF only)

GRANTED. If Judge Willis determines that a discovery extension is merited, the parties' pre-motion letters for summary judgment shall be due within two weeks following the close of the extended fact discovery period. If the motion to extend discovery is denied, the parties shall file their pre-motion letters within two weeks following the denial order.

SO ORDERED.

Dated: August 5, 2024  
New York, New York

  
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ANALISA TORRES  
United States District Judge